

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

BERTRAND GIRARD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.2:16-cv-00165-dbh
	)	
STEPHEN DODD,	)	
ROGER BEAUPRE,	)	
and	)	
CITY OF BIDDEFORD	)	
	)	
Defendants	)	

**STEPHEN DODD’S ANSWER TO PLAINTIFF’S  
FIRST AMENDED COMPLAINT**

I, Stephen Dodd, answer the plaintiff’s First Amended Complaint as follows:

I admit the allegations in ¶¶ 8 and 9 of the Complaint.

I deny the allegations in ¶¶ 1, 3-5, 10-20, 22-38, 42-49, 52-55, 57-59, 65, 67, 74-82, and 84-86.

I have insufficient knowledge to respond to the allegations in ¶¶ 2, 6, 7, 21, 39-41, 50, 60-63, 66, and 68-72, and therefore I deny those allegations.

In response to ¶¶ 51, 56, 64, 73, and 83 I reallege my previous responses.

**AFFIRMATIVE DEFENSES**

1. The plaintiff’s Complaint is barred by the statute of limitations.
2. The plaintiff’s Complaint does not state a claim against me on which relief can be granted.

Dated: 09/21/2016

/s/ Stephen M. Dodd  
\_\_\_\_\_  
Stephen M. Dodd, *pro se*

**CERTIFICATE OF SERVICE**

This is to certify that on this 21st day of September, 2016 Defendant Stephen Dodd's Answer was filed using the CM/ECF system which will send notice of the electronic filing to parties and counsel of record.

/s/ Stephen M. Dodd

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Stephen M. Dodd, *pro se*